



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

June 3, 2016

Andrew Orciari, Environmental Representative  
Solutia Inc.  
730 Worcester Street  
Springfield, MA 01151

Re: **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), and Massachusetts General Law Chapters 21 C, Sections 4 and 6.

Dear Mr. Orciari:

On July 27-28, 2015, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Solutia Inc., EPA ID No. MAD001114818, with Massachusetts Hazardous Waste Regulations 310 CMR 30.00 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Massachusetts has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of the Massachusetts Hazardous Waste Regulations 310 CMR 30.00 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

1. Failure to make adequate waste determinations for waste aerosols containing chlorinated products;
2. Failure to handle waste in a manner to minimize the potential for a release of the resin waste on the floor underneath the filter press and outside of the tray that does not collect all the drippings, in Building 142;
3. Failure to appropriately label a container of hazardous waste "slops" containing ethanol, ethyl acetate, PVAC, PVB with the words "Hazardous Waste", located in Building 142- Quality Control Lab SAA;
4. Failure to furnish the facility with proper emergency equipment including: telephone, fire extinguisher, spill control equipment and an up-to-date written list containing the following information, a copy of which shall be prominently posted near the telephones at the site of accumulation: (1) name and telephone numbers of emergency coordinators (2) locations of fire

extinguishers and, spill control material and if present, the fire alarms (3) the telephone number of the fire department or, if there is a direct alarm system, instructions on how to activate it, or both (4) evacuation routes, for the following areas: RB-9100 Building 92 HWSA, Building 386 HWSA and Building 67 HWSA;

5. Failure to post a "No Smoking" sign where there is a potential or actual hazard from ignitable or reactive waste at the RB 9100 Building 92 HWSA and the Building 142 HWSA, located outside on the southside of the building;
6. Failure to train employees with hazardous waste management duties; and
7. Failure to appropriately label one container of waste oil with the words "Waste Oil for Recycling, Toxic".

**Solutia Inc. must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

**Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violations to:**

Susann Nachmann, Environmental Engineer  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

Failure to correct the violation as required by this NOTICE may subject the facility to further federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Susann Nachmann, at (617) 918-1871.

Sincerely,

Mary Jane O'Donnell, Manager  
RCRA, EPCRA, and Federal Programs Unit

cc: Saadi Motamedi, MA DEP  
File